

## Pavitt, John

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**From:** Pavitt, John  
**Sent:** Tuesday, August 13, 2013 8:28 AM  
**To:** Hedgpeth, Zach  
**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Zach, thanks for reviewing the test plan. I have 2 days of training this week and may not get a chance to look at it.

John Pavitt  
EPA Region 10, Alaska Operations Office  
(907) 271-3688

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**From:** Hedgpeth, Zach  
**Sent:** Monday, August 12, 2013 11:50 AM  
**To:** Valdez, Heather  
**Cc:** Johnson, Steffan; Pavitt, John; Jones, Toni  
**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

No problem Heather. I'll review the latest documents along with Stef's comments and discuss with Stef before he goes on leave so I'm prepared for the meeting.

Zach Hedgpeth  
206-553-1217

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**From:** Valdez, Heather  
**Sent:** Monday, August 12, 2013 12:14 PM  
**To:** Hedgpeth, Zach  
**Cc:** Johnson, Steffan; Pavitt, John; Jones, Toni  
**Subject:** FW: Revised Petition Pursuant to 40 CFR 60.2115

Hi Zach, so there you have it, I guess they were not planning on a revised test plan, just some responses to our comments that will be attached.

So the plan is to proceed with the meeting on Aug 22<sup>nd</sup>. 9am Pacific. They will be coming into the office and we can call Toni.

Zach, I'm hoping Stef and you can verify what you will want to be able to convey to them, given this info we have, if this coming test is to count as their official initial performance test to demonstrate compliance with all of the CISWI NSPS limits as finalized in the 2013 reconsideration amendments.

Heather Valdez  
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EPA Region 10  
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[valdez.heather@epa.gov](mailto:valdez.heather@epa.gov)

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<http://www.combustionportal.org/>

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**From:** Sally McLeod [<mailto:Sally.Mcleod@smpmogo.com>]

**Sent:** Monday, August 12, 2013 11:28 AM

**To:** Valdez, Heather

**Cc:** Hedgpeth, Zach; Pavitt, John

**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Heather,

Our Source Test Plan will be the same as before (attached). We will just be re-submitting it to you along with a response to your informal suggestions.

Maybe Step could review this information and chat with Zach?

I would like to proceed with the August 22 meeting.

Sally S. McLeod, CEM, REM

Environmental Manager

Sumitomo Metal Mining Pogo LLC

Office: 907-895-2879 (Mon-Thurs)

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**From:** Valdez, Heather [<mailto:Valdez.Heather@epa.gov>]

**Sent:** Monday, August 12, 2013 9:20 AM

**To:** Sally McLeod

**Cc:** Hedgpeth, Zach; Pavitt, John

**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Hi Sally, Zach, John Pavitt, and I are good for that date, Aug 22<sup>nd</sup> 9am Pacific. I can also have the headquarters OAQPS contact on the line, the CISWI rule writer, Toni Jones, in case she can be of assistance with details about the testing requirements. I had hoped to get Zach's headquarters counterpart, the technical source testing expert, Stef Johnson, on the phone as well. But, he will be out of the office and unavailable either week.

Stef is great at reviewing information and giving us good comments. And he has said that he could do that up until he goes on leave Aug 21<sup>st</sup>. So if you are able to share any more info, like the detailed source test plan in advance of the

meeting, we could have Step review that, he and Zach could discuss it, and then Zach would be more prepared to share with you any feedback Stef may have to offer.

Otherwise the other option would be to put the meeting off until Step was also available to be on the phone with us. He will be back Sep 3<sup>rd</sup>. But I don't know if that puts you in too much of a pinch for the timing of your test, if you don't find out from us until after then what might need fine tuning in your petition or test plan.

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**From:** Sally McLeod [<mailto:Sally.Mcleod@smpmogo.com>]  
**Sent:** Monday, August 12, 2013 9:49 AM  
**To:** Valdez, Heather  
**Subject:** Re: Revised Petition Pursuant to 40 CFR 60.2115

Are we set for meeting yet? We need to make our travel arrangements.

Sally McLeod  
Environmental Manager  
Sumitomo Metal Mining Pogo LLC

On Aug 8, 2013, at 1:17 PM, "Valdez, Heather" <[Valdez.Heather@epa.gov](mailto:Valdez.Heather@epa.gov)> wrote:

Hi Sally, could you do 9am on the 22<sup>nd</sup>, if that works for you I am close to finalizing, I just need to confirm one more person at that time.

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EPA Region 10  
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**From:** Sally McLeod [<mailto:Sally.Mcleod@smpmogo.com>]  
**Sent:** Thursday, August 08, 2013 10:51 AM  
**To:** Valdez, Heather  
**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Great! Thanks. Zach has approval to come observe the next stack test.

Sally S. McLeod, CEM, REM  
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**From:** Valdez, Heather [<mailto:Valdez.Heather@epa.gov>]  
**Sent:** Thursday, August 08, 2013 9:02 AM  
**To:** Sally McLeod; [john.kuterbach@alaska.gov](mailto:john.kuterbach@alaska.gov)  
**Cc:** Michael Short; Hunter, Jeffrey (Perkins Coie); Rosburg, John; Chris Kennedy  
**Subject:** RE: Revised Petition Pursuant to 40 CFR 60.2115

Thank you Sally, I am working to find out if the time you have suggested for a meeting will work, so far it is looking like the first day would be better, I will let you know for sure as soon as I can.

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**From:** Sally McLeod [<mailto:Sally.Mcleod@smmpogo.com>]  
**Sent:** Tuesday, August 06, 2013 7:17 PM  
**To:** Valdez, Heather; [john.kuterbach@alaska.gov](mailto:john.kuterbach@alaska.gov)  
**Cc:** Michael Short; Hunter, Jeffrey (Perkins Coie); Rosburg, John; Chris Kennedy  
**Subject:** Revised Petition Pursuant to 40 CFR 60.2115

Heather,  
Attached is Pogo's revised Petition. A hard copy will be certified mailed to the Director tomorrow. Pogo would like to set up a meeting with you in Seattle. Would August 22 or 28 work? The purpose of the meeting would be to present the results of our first incinerator stack test and discuss options for controls. Both our stack test contractor and AQ specialist could be present. Therefore the focus would be technical discussion. If needed, we'd like to follow up with a brief meeting with counsel to discuss Pogo's path forward. Please give me a call if you wish to discuss.

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